

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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STERLING D. BROWN,  
Plaintiff,

v.

Civil Action No. 2:18-cv-922

City of Milwaukee, et al.  
Defendants.

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THOMPSON AFFIDVAIT IN SUPPORT OF MOTION TO STRIKE RULE 68 OFFER OF  
JUDGMENT

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Scott B. Thompson, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney at the law firm of GINRAS, THOMSEN & WACHS LLP, and am one of the attorneys representing plaintiff in the above-captioned matter.
2. Attached as Exhibit A is a true and correct copy of an offer of Judgment signed on September 24, 2019.
3. Attached as Exhibit B is a true and correct copy of excerpts from the deposition of Defendant Officer Andrade.
4. Attached as Exhibit C is a true and correct copy of excerpts from the deposition of Defendant Officer Samardzic.
5. Attached as Exhibit D is a true and correct copy of excerpts from the deposition of Defendant Sergeant Krueger.
6. Attached as Exhibit E is a true and correct copy of excerpts from the deposition of Defendant Officer Collins.
7. Attached as Exhibit F is a true and correct copy of excerpts from the deposition of Defendant Sergeant Mahnke.
8. Attached as Exhibit G is a true and correct copy of excerpts from the deposition of Defendant Officer Avila.
9. Attached as Exhibit H is a true and correct copy of transcripts from the deposition of Detective Paul Kavanagh.

10. Attached as Exhibit I is a true and correct copy of excerpts from the deposition of Inspector T. Gordon.
11. Attached as Exhibit J is a true and correct copy of excerpts from the deposition of Defendant Grams.
12. Attached as Exhibit K is a true and correct copy of deposition exhibit 114 from the deposition of Defendant Sergeant Krueger.
13. This is my transcription of language from a video produced to Plaintiff in discovery, bates numbered MM-MPD SDB0003.



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Scott B. Thompson

Subscribed and sworn to before me

This 8th day of October, 2019.



Notary Public, State of Wisconsin

My Commission Expires 07/10/20